

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO: 24-cr-20295-JB

Plaintiff,

vs.

BRYAN TOCHON-LOPEZ,
WILMER MOISES BARSELO,
JOSE FELICIANO LEMOS,
JESUS RODRIGUEZ,
LUIS ANDRES ZUNIAGA,
JORGE LUIS LOPEZ-ASTUDILLO,
EULIDES OLIVEROS-LUGO,
STIVEN JOSE FLORES

Defendants.

UNOPPOSED JOINT MOTION FOR CONTINUANCE OF TRIAL

Defendants, **BRAYAN TOCHON-LOPEZ, WILMER MOISES BARSELO, JOSE FELICIANO LEMOS, JESUS RODRIGUEZ, LUIS ANDRES ZUNIAGA, JORGE LUIS LOPEZ-ASTUDILLO, EULIDES OLIVEROS-LUGO, and STIVEN JOSE FLORES**, by and through their counsel, and in accordance with *18 U.S.C. §3161(h)(7)* and *S.D. Fla. L.R. 7.6*, hereby file this Unopposed Joint Motion for Continuance of the currently set trial date. As grounds in support of this request, the Defendants state:

1. On or about June 26, 2024, the Defendants were arrested after being intercepted upon the high seas and elsewhere outside the jurisdiction of any particular State or district.
2. On July 11th, 2024, the Government filed an indictment charging the Defendants with Conspiracy to Possess with Intent to Distribute a Controlled Substance While On Board a Vessel



Subject to the Jurisdiction of the United States (Count 1) and Possession with Intent to Distribute a Controlled Substance While On Board a Vessel Subject to the Jurisdiction of the United States.

3. On July 22nd, 2024, the Defendants were arraigned in this matter [DE 15, 16, 17, 18, 19, 20, 21, 22].

4. On or about July 22, 2024, the Government provided discovery to Defendants.

5. On February 12, 2025, Defendants filed a Joint Motion to Dismiss.

6. The Government has until March 4, 2025, to file its response and Defendants' Reply would be due on March 14, 2025.

7. A jury trial on this matter is currently set for March 10, 2025, and calendar call is scheduled for March 4, 2025.

8. Accordingly, Defendants request a continuance of the trial date until after the Motion to Dismiss has been fully briefed by the Parties, and the Court has considered the Defendants' Motion to Dismiss.

9. This Motion is being filed in good faith, in the interests of judicial economy to afford the Parties proper opportunity to resolve this matter without need for trial, and in furtherance of providing Defendants effective assistance of counsel. The subject Motion is not being filed for purposes of undue delay.

CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 88.9

On February 21, 2025, the undersigned conferred with AUSA Yvonne Rodriguez-Shack who advised that the Government does not object to the Court granting this Motion for Continuance. Additionally, after conferral with counsel for the codefendants, the codefendants join in the motion.

WHEREFORE, Defendants, **BRAYAN TOCHON-LOPEZ, WILMER MOISES BARSELO, JOSE FELICIANO LEMOS, JESUS RODRIGUEZ, LUIS ANDRES ZUNIAGA, JORGE LUIS LOPEZ-ASTUDILLO, EULIDES OLIVEROS-LUGO**, and **STIVEN JOSE FLORES**, respectfully pray that this Honorable Court grant the Defendants' Joint Motion for Continuance of trial, enter an Order continuing this case to, at least, a date in April 2025, when the Defendants' Motion to Dismiss has been fully briefed by the Parties and the Court has considered the Defendants' Motion to Dismiss, and for any other relief the Court deems proper and just under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was electronically filed via *CM/ECF* this 21st day of February 2025, and a courtesy copy of the foregoing furnished via email to all counsel of record.

Respectfully submitted,

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